

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Reginald Smith) 07 C 6166
v.)
) Judge John W. Darrah
Sheriff of Cook County)
and Cook County)

WRITTEN REPORT OF RULE 26(f) PLANNING CONFERENCE

Plaintiffs, by and through their attorneys, Thomas G. Morrissey, Ltd., and Kenneth N. Flaxman and defendants, by and through their attorney, Assistant States Attorney Daniel J. Fahgren, state as follows:

1. Disclosures pursuant to Fed. R. Civ. P. 26(a)(1) were tendered to defendants on January 18, 2008. Defendants will make their Rule 26(a)(1) disclosures by February 15, 2008.

2. Discovery will be needed on the following subjects:

At the time of the Plaintiff's admission to the Cook County Jail, plaintiff claims he suffered from high blood and his speech was limited due to a stroke. As a consequence of his medical condition, plaintiff alleges that he was taking a variety of prescription medications and the defendants were informed of this fact when he entered the Jail. Plaintiff further alleges that the defendants have a policy and/or practice of delaying access to prescription medication for persons processed into the jail and that he did not receive his medication until November 16, 2005 which resulted in swelling in plaintiff's lower legs.

Discovery will be needed to determine whether the defendants were aware of the plaintiff's medical condition after he entered the jail and whether there was a delay in providing

the medication to the plaintiff. Discovery will also be need to determine whether the defendants had a practice of delaying access to prescription medication for persons processed into the jail.

In addition, discovery will be required to determine the extent and nature of plaintiff's damages.

3. The parties suggest the following discovery plan:
 - a. Six months to complete fact discovery.
 - b. Reports from retained experts under Rule 26(a)(2) due:

from Plaintiffs by July 15, 2008

from defendants by August 15, 2008
 - c. The parties should be allowed until May 15, 2008 to join additional parties and to amend the pleadings.
 - d. Dispositives motions shall be filed by September 15, 2008.

Respectfully submitted,

/s/Thomas G. Morrissey
One of the Attorneys for the Plaintiffs
Thomas G. Morrissey, Ltd.
10249 S. Western Ave.
Chicago, Il. 60643
(773)-233-7900

/s/Daniel J. Fahlgren
Attorney for the Defendants

Daniel J. Fahlgren
Assistant State's Attorney
500 Richard J. Daley Center
Chicago, Il. 60602

Kenneth N. Flaxman
200 S. South Michigan
Suite 1240
Chicago, Il. 60604-2430
9312) 427-3200

Date: _____